

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SAMUEL H. MURRAY, *
Plaintiff, *

v. *

WARDEN RICHARD GRAHAM, *
et al., *

Defendants. *

Civil Action No. GLR-18-2317

* * * * *

**UNOPPOSED MOTION FOR LEAVE OF COURT TO TAKE
DEPOSITION OF MARQUIS WILLIAMS**

Defendants, by undersigned counsel, pursuant to Rule 30(a)(2)(B) of the Federal Rules of Civil Procedure, hereby seek leave of court to take the deposition of inmate Marquis Williams. In support, Defendants state:

1. The above-captioned litigation is a tort action filed by Plaintiff seeking damages resulting from the death of Darrell Murray, who was killed by his cellmate on July 29, 2015, while both inmates were serving sentences at the Western Correctional Institution.

2. As the Court is aware, the parties are in the process of conducting fact discovery. In conjunction with the above-litigation, Defendants require the deposition of non-party witness Marquis Williams, who was an inmate at Western Correctional Institution at the time Darrell Murray was killed, and who currently is incarcerated at the Maryland Correctional Institution – Jessup (“MCIJ”). With the Court’s permission, the

parties anticipate proceeding with Mr. Williams' deposition at MCIJ on June 4, 2019, and have made the necessary arrangements with MCIJ.

3. In light of the foregoing, Defendants respectfully request leave to depose Marquis Williams at MCIJ on June 4, 2019. Counsel for Plaintiff does not object to this request. Attached hereto is a proposed order for the Court's endorsement.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

/s/
EDWARD J. KELLEY
Assistant Attorney General
Bar No. 27039
Department of Public Safety and
Correctional Services
300 East Joppa Road, Suite 1000
Towson, MD 21286
410-339-3782
Edward.Kelley@maryland.gov
Attorneys for the Department

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of May, 2019, a copy of the foregoing Defendants' Motion for Leave of Court to take the deposition of inmate Marquis Williams and proposed order was served on counsel of record by electronic means.

/s/
EDWARD J. KELLEY
Assistant Attorney General